

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:21-cr-40039-SMY
)	
MINGQING XIAO,)	
)	
Defendant.)	

UNITED STATES' SUPPLEMENTAL MOTION IN LIMINE (#6)

It has recently come to the attention of the government that the Federal Bureau of Investigation, including agents Stephen Dalechek and Chris Bockelmann, have conducted presentations regarding China to regional businesses and non-profits. This included a presentation to Southern Illinois University's Board of Trustees in or around February 2019. That presentation included information about China's use of "talent plans" and the possibility that talent recruits could use U.S. government funding to accelerate or amplify projects funded by the government of China. The presentation did not comment on pending or future investigations in this district, or mention Professor Xiao in any way (in fact, it came before the investigation was opened). These statements were not about the same subject matter as the agent's expected testimony at trial. Thus, the government does not consider the presentations to be a statement that "relates to the subject matter of the witness's testimony," but makes this disclosure out of an abundance of caution. Fed. R. Evid. 26(2)(a). The government moves to exclude questioning about these presentations, consistent with the prior motions in limine filed by both the United States and the Defendant.

CONCLUSION

For the foregoing reasons, the government respectfully asks the Court to grant this motion in limine.

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Certificate of Service

I hereby certify that on April 12, 2022, I caused the foregoing to be filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

s/ *Peter T. Reed*
PETER T. REED
Assistant United States Attorney